UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

FILED

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U.S. DISTRICT COURT
EASTERN DIST. TENN.

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. 3:16-CR- 117
v.	)	
	)	JUDGES Reeves/Guyton
ROGER DALE WILLIAMS,	)	
	)	
Defendant.	)	

INFORMATION

The United States Attorney charges that:

COUNT 1
(Mail Fraud)

Purpose of the Scheme

1. From in or about June 2001and continuing through in or about July 2015, within the Eastern District of Tennessee, knowingly and with intent to defraud, devised and intended to devise a scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

2. It was part of the scheme that defendant ROGER DALE WILLIAMS would and did defraud numerous individuals by soliciting victims to entrust the defendant with the victims' funds under false pretenses that defendant would invest their funds in legitimate investments, failing to invest funds transferred to defendant as promised, and misappropriating and converting investor funds entrusted to defendant for defendant's personal benefit without the knowledge or authorization of the investors.

3. It was further part of the scheme that defendant ROGER DALE WILLIAMS would and did fraudulently represent to prospective investors that he would invest funds entrusted to him in a purported "investment club" which the defendant purported to operate under various names, including "Park Investments," "Open Door Investments," "Dash Holdings," "Regional Trade Exchange Corporation," and "Development Connections." Defendant falsely represented to his victims that their funds would be invested into these and other ventures and that the victims would receive a high yield on their investments.

4. It was further part of the scheme that defendant ROGER DALE WILLIAMS would and did falsely and fraudulently solicit contributions from victims purporting to be for the purpose of paying off the debt of King Branch Road Church of Christ ("KBRCC") in Pigeon Forge, Tennessee, when, in truth and in fact, the defendant intended to and would and did utilize such contributions for his personal use.

5. It was further part of the scheme that defendant ROGER DALE WILLIAMS would and did fraudulently represent to prospective investors that he would invest funds entrusted to him to purchase shares in a business prior to an Initial Public Offering ("IPO") of a stock in the business with a guaranteed rate of return of 20 percent of the amount invested when, in truth and in fact, the defendant intended to and would and did utilize such contributions for his personal use.

6. It was further part of the scheme that defendant ROGER DALE WILLIAMS would and did run a "Ponzi scheme" by diverting portions of new victims' "investment" funds to existing investors for the purpose of lulling the existing investors into believing that they were in fact receiving returns on their investments when, in truth and in fact, the new victims' funds were not being invested as defendant had falsely and fraudulently represented to the new victims.

7. It was further part of the scheme that defendant ROGER DALE WILLIAMS would and did utilize the United States Mail in order to send materials touting defendant's false and fraudulent investment scheme to his victims as a means to entice and attempt to entice the victims to give the defendant money.

8. It was further part of the scheme that defendant ROGER DALE WILLIAMS would and did cause and attempt to cause victim investors to send him money in the form of checks that the defendant falsely and fraudulently represented that he would invest for the victims.

EXECUTION OF THE MAIL FRAUD SCHEME

9. From in or about 2001 through in or about July 2015, within the Eastern District of Tennessee and elsewhere, defendant ROGER DALE WILLIAMS, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, as representative of the means by which defendant ROGER DALE WILLIAMS executed the scheme, placed and caused to be placed the following things into an authorized depository for mail matter to be delivered by the Postal Service:

a. In or about June 2001, defendant represented to his victims that their "investment club" was investing funds in a business defendant had registered as Quick Curb of East Tennessee, LLC, which had "all the equipment to do the jobs and the crew is trained," when, in truth and in fact, the business had not purchased any equipment or hired any crews;

b. In or about May 2002, defendant sent an "Open Door Investments Report" in which the defendant falsely represented to the victims and intended victims that investors could invest in "guaranteed return" bonds with 8% to 24% yields, depending upon the amount invested and the length of time to maturity;

c. In or about May 2006, defendant sent an "Open Door Investments Report" in which the defendant falsely represented to victims and intended victims that investors could invest in a business prior to an IPO with a guaranteed rate of return of 20%;

d. In or about January 2009, defendant sent a "Dash Holdings, Inc." "Annual Report and Tax Forms" to victims and intended victims in which defendant falsely represented that the 2008 return on investments was 14.8% and that the "club" had a total gain since inception of 278%;

e. On or about June 15, 2011, defendant sent an "interim report" to victims and intended victims in which defendant falsely represented that their investment funds were being invested into another business and that there would be a dividend distribution moratorium during the transition;

f. On or about January 1, 2013, defendant sent a report to victims G.S. and K.S. in which defendant falsely represented that the victims' IRA balance was $204,400.76;

g. In or about July 2015, defendant sent an update report to church bond investors in KBRCC in Pigeon Forge, Tennessee, in which defendant, with intent to defraud, encouraged investors to release KBRCC from its indebtedness to the investors as a "donation" to KBRCC;

h. Upon convincing the victims to withdraw funds on deposit in existing IRAs into the rollover "self-directed" IRAs, the defendant would convince the victims to direct the rollover IRAs to transfer funds into purported investments, some of which he then converted to his personal use and benefit;

i. Defendant falsely and fraudulently solicited contributions from victims purporting to be for the purpose of paying off the debt of KBRCC, when, in truth and in fact, the defendant intended to and did utilize such contributions for his personal use and benefit; and

j. In order to perpetrate and perpetuate the continuance of the fraud scheme, the defendant sent funds obtained from victims to other victims of the scheme in order to make it appear that the victims were earning returns on investments when, in truth and in fact, the defendant did not invest the victims' funds as he had falsely represented and the defendant used investor funds for his personal benefit, including paying for personal living expenses, utilities, food, vehicle payments and fuel purchases, vacations, and transferring investor funds into defendant's personal bank accounts.

All in violation of Title 18, United States Code, Sections 1341 and 1349.

COUNT 2
(Money Laundering)

1. The allegations contained in Count 1 of this Information are repeated, re-alleged and incorporated by reference as if fully set forth herein.

2. On or about November 4, 2011, within the Eastern District of Tennessee, defendant ROGER DALE WILLIAMS did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit an internet wire transfer of $14,001.82 to victim G.E., which involved the proceeds of a specified unlawful activity, that is

the mail fraud scheme describe in Count 1, above, with the intent to promote the carrying on of specified unlawful activity, to wit: the perpetuation of the mail fraud scheme in violation of Title 18, United States Code, Section 1341, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT 3
(Obstruction of Administration of Federal Tax Laws)

1. The allegations contained in Count 1 of this Information are repeated, re-alleged and incorporated by reference as if fully set forth herein.

2. From in or about 2005 through on or about March 2014, within the Eastern District of Tennessee and elsewhere, the defendant ROGER DALE WILLIAMS did corruptly endeavor to obstruct and impede the due administration of the internal revenue laws, by filing and causing others to file false Internal Revenue Service ("IRS") tax forms in association with and in furtherance of the fraud scheme alleged in Count 1, including, as representative of the means by which the defendant corruptly endeavored to obstruct and impede the due administration of the internal revenue laws, the defendant did the following:

a. For tax years 2005 and 2006, defendant issued false IRS forms to victims and to the IRS which falsely represented the amounts of interest income the victims had purportedly earned from investments the victims had purportedly made into "Open Door Investments";

b. For tax years 2007, 2008, and 2011, defendant filed IRS Forms 1120s in the name of "Dash Holdings, Inc." which were materially false;

c. For tax years 2007, 2008, and 2011, defendant issued IRS Schedules K-1 to victims of the fraud scheme and to the IRS which falsely reported interest income from "Dash Holdings, Inc." thereon;

d. On or about May 24, 2012, in response to an IRS inquiry into victim J.W.'s tax filings, defendant issued a false and fraudulent 2010 IRS Form 5498, which victim J.W. submitted to the IRS, on which defendant falsely represented that victim J.W. made a rollover contribution of $10,148.19 from J.W.'s IRA into Dash Holdings, Inc., when, in truth and in fact, the defendant had converted those funds to his personal use and no such rollover contribution had occurred; and

e. In or about March 2014, in response to an IRS inquiry into victim G.P.'s tax filings, defendant generated and issued a false and fraudulent IRS Form 5498, which was used to prepare G.P.'s 2012 tax return, on which defendant falsely represented that victim G.P. made a rollover contribution of $147,482.00 into Dash Holdings, Inc., when, in truth and in fact, the defendant had converted those funds and no such rollover contribution had actually occurred.

All in violation of Title 26, United States Code, Section 7212(a).

NANCY STALLARD HARR
United States Attorney

By: [signature]
Matthew T. Morris
Assistant United States Attorney
800 Market Street, Suite 211
Knoxville, Tennessee 37902
(865) 545-4167